

Ms. Danette L. Guy
U.S. Army Corps of Engineers
c/o MBTL EIS
710 Second Avenue, Suite 550
Seattle, WA 98104
Phone: (206) 316-3048.
Email: comments@millenniumbulkeiswa.gov

Re: Millennium Bulk Terminals Longview Proposal

To Whom It May Concern;

Thank you for this opportunity to comment on the proposed Millennium Bulk Terminals Longview (“MBTL”) project. As someone born and raised in Cowlitz County, I am aware of the need to find a balance between the economic and environmental interests in the area.

Introduction

As a child growing up in Washington, I was fortunate to dip for smelt, dig for clams, collect oysters, fish for steelhead and salmon, and trap shrimp and crab in Washington waters. The region was, and still is, rich in resources. In Cowlitz County, it was not uncommon to see timber and aluminum products being processed and transported in the area. These industries supported thousands of local families for many years. Everyone I knew growing up was supported by either the timber or aluminum industry. However, the proposed MBTL project does not effectively replace the employment void in Cowlitz County created by the closing of Reynolds Metals. Furthermore, the project potentially threatens the state, local, and global environment in multiple ways.

Local Jobs & Critical Areas

Reynolds Metals employed approximately 1000 employees for nearly six decades, thereby creating jobs for thousands of Cowlitz County families over the years. According to the feasibility study conducted by MBTL, construction of the project will support an estimated 1350 temporary direct jobs and the finalized project will produce only 135 direct jobs.¹ While Cowlitz County desperately needs an economic boost, please consider whether 135 potentially local jobs in the long run is in the best interest of the local community when compared to the impact of 3000 additional coal trains and 44 metric tonnes of coal passing through Longview and along the Columbia River every year.²

Although the proposed project will utilize the current brownfield left behind by Reynolds Metals, the Joint Aquatic Resources Permit Application (“JARPA”) submitted by MBTL clearly

¹ Economic & Fiscal Impacts of Millennium Bulk Terminals Longview, Berk Consulting, April 12, 2012.

² Economic & Fiscal Impacts of Millennium Bulk Terminals Longview, Berk Consulting, April 12, 2012.

indicates that the project will impact critical habitat areas where multiple threatened and endangered species exist. When conducting the Environmental Impact Statement (“EIS”), please consider the very few local jobs created by this project and the significant impact the project may have on the quality of life for local and state residents, including water and air quality, recreational and aesthetic activities, and the locally threatened and endangered species in areas impacted by the project.

Lower Columbia Ship Traffic

Another significant impact of the project will be increased ship traffic along the Columbia River. MBTL estimates that the project will be served by approximately 200 ships annually; resulting in 600 new trips by ships on the Lower Columbia River, or a 16% increase in ship traffic.³ Having been fortunate enough to spend much of my life on the Columbia, it is nearly impossible to imagine hundreds of ships full of coal being transported along such a beautiful river. In addition to the navigational and environmental issues surrounding the increased ship traffic, those local to the area are aware that when a loaded ocean bound ship leaves Longview it creates a tremendous amount of suction, creating a dangerous undertow for those fishing, swimming, living, or working on the Lower Columbia. Please consider the impact that a 16% increase in ship traffic every year will have on those living and working along the river.

Train Traffic & SR 432

In addition to the increased ship traffic, the project is estimated to increase train traffic by 3000 unit trains annually.⁴ MBTL’s planned rail use spans many hundreds of miles and crosses State Route 432 at the foot of the Lewis & Clark Bridge in Longview. According to the Washington State Department of Transportation, this interstate bridge carries an average of 21,000 vehicles per day and approximately 13% of those vehicles are large semi-trailer trucks.⁵ Please consider the impact of 3000 additional unit trains annually on the 21,000 vehicles that pass over this train track every day and how MBTL will mitigate such an impact. MBTL also proposes a potential bulk terminal to store and transport raw materials for manufacturing. This will mean additional truck traffic at the local and interstate level, especially regarding the Lewis & Clark Bridge.

Local, State, & Private Interests

As acknowledged in MBTL’s permit applications and informational materials, the proposed project prioritizes state interest over local interests. In reality, other than the temporary construction jobs and the potential for 135 long term jobs, much of the profits from the project will go to out of state private entities. While Cowlitz County, and Longview in particular, will bear much of the pollution and traffic from this project, it will likely not greatly improve the quality of life for most of the residents of Cowlitz County.

On the permit application, MBTL indicates that one of its goals is to encourage and establish industrial and commercial development due to the fact that ports by their nature are gravitational points for industrial and manufacturing firms.⁶ Longview has been a port town for 100 years and is in fact in an ideal place for certain industries. However, state and local interests should lie in

³ Economic & Fiscal Impacts of Millennium Bulk Terminals Longview, Berk Consulting, April 12, 2012.

⁴ Economic & Fiscal Impacts of Millennium Bulk Terminals Longview, Berk Consulting, April 12, 2012.

⁵ <http://www.wsdot.wa.gov/projects/sr433/lewisclarkbridgepainter/>

⁶ MBTL Permit Application, February 22, 2012.

promoting innovative and sustainable industries and clean technology that will benefit our economy today and in the future without continuing to destroy the environment. When conducting the EIS, please consider whether MBTL has taken measures towards sustainable industry and whether there is a concrete plan in place for implanting reasonably practicable environmentally sustainable industrial practices at the project site in Longview and all other areas touched by the project.

Conclusion

In the process of creating an EIS, there are many issues to consider on the state and global level. However, please do not fail to take into consideration the effect of the proposed project on the local community and whether the project will actually improve the economy and environment of Cowlitz County. Thank you in advance for your consideration.

Sincerely,
Jennifer Lamari
J.D. Candidate, 2014
Gonzaga University School of Law